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**Pro hac vice application forthcoming*

Attorneys for Defendant
MGM Resorts International

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CHARLES BEZAK, individually and on behalf
of all others similarly situated

Plaintiff,

v.

MGM RESORTS INTERNATIONAL,

Defendant.

Case No. 2:23-cv-01719-RFB-BNW

**STIPULATION TO EXTEND TIME
TO FILE DEFENDANT'S
RESPONSE TO COMPLAINT
(FIRST REQUEST)**

Pursuant to LR IA 6-1, Plaintiff Charles Bezak and Defendant MGM Resorts International ("MGM") (collectively, the "Parties") respectfully stipulate MGM's time to respond to the Complaint be extended from the current deadline of November 24, 2023 to

1 and including December 12, 2023. This is the first stipulation for an extension of time to file
2 MGM's responsive pleading.

3 Good cause exists to enlarge the time for MGM to respond to the Complaint.
4 Between September 21 and November 8, 2023, eleven other related actions were filed
5 against MGM in this and two other federal courts (the "Related Actions"). *See Owens v.*
6 *MGM Resorts Int'l*, No. 2:23-cv-01480 (D. Nev.); *Kirwan v. MGM Resorts Int'l*, No. 2:23-
7 cv-01481 (D. Nev.); *Zussman v. VICI Properties I LLC, et al.*, No. 2:23-cv-01537 (D. Nev.);
8 *Lackey v. MGM Resorts Int'l*, No. 2:23-cv-01549 (D. Nev.); *Pircio v. MGM Resorts Int'l*,
9 No. 2:23-cv-01550 (D. Nev.); *Terezo v. MGM Resorts Int'l*, No. 2:23-cv-01577 (D. Nev.);
10 *Rundell v. MGM Resorts Int'l*, No. 2:23-cv-01698 (D. Nev.); *Zari v. MGM Resorts Int'l*, No.
11 2:23-cv-01777 (D. Nev.); *Manson v. MGM Resorts Int'l*, No. 2:23-cv-01826 (D. Nev.);
12 *Albrigo v. MGM Resorts Int'l*, No. 3:23-cv-01797 (S.D. Cal.); *Lassoff v. MGM Resorts Int'l*,
13 *et al.*, No. 1:23-cv-20419 (D.N.J.).

14 MGM's counsel was only recently retained and requires additional time to review,
15 investigate, and analyze the allegations in both the Complaint and the Related Actions.
16 Moreover, based on the Parties' current understanding of the claims, there are significant
17 overlaps between this action and the Related Actions. As such, additional time is required to
18 permit time to meet and confer with the various parties to the Related Actions, evaluate the
19 potential consolidation of the cases, and conserve judicial resources.

20 The Parties' request is made in good faith to enable MGM to complete an
21 investigation into Plaintiff's claims. Moreover, this case is in its infancy, and this request
22 will not prejudice any party.

23 A proposed order is attached.

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1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 CHARLES BEZAK, individually and on behalf
4 of all others similarly situated

5 Plaintiff,

6 v.

7 MGM RESORTS INTERNATIONAL,

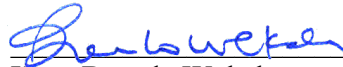
8 Defendant.

Case No. 2:23-cv-1719-RFB-BNW

**[PROPOSED] ORDER GRANTING
STIPULATION TO EXTEND TIME
TO FILE DEFENDANT'S
RESPONSE TO COMPLAINT**

9
10 Upon consideration of the foregoing stipulation to extend Defendant MGM Resorts
11 International's time to file response to Plaintiff's Complaint in the above-captioned action,
12 it is hereby **ORDERED** that the Stipulation is **GRANTED**, and the time for MGM Resorts
13 International to answer, move, or otherwise respond to Plaintiff's Complaint is hereby
14 extended to and including December 12, 2023.

15
16 **IT IS SO ORDERED:**

17 

18 Hon. Brenda Weksler
19 United States Magistrate Judge

20 DATED: 11/27/2023